Patrick L. Deedon, State Bar No. 245490
John R. Powell, State Bar No. 320187
MAIRE & DEEDON
2851 Park Marina Drive, Suite 300
Redding, CA 96001-2813
(530) 246-6050 / 246-6060 (fax)
pdeedon@maire-law.com
jpowell@maire-law.com

Attorneys for Defendant,
COSTCO WHOLESALE CORPORATION

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

CLARA ELENA HUERTA RAMIREZ,	CASE NO. 2:24-cv-02779-DJC DMC
Plaintiff,	*[Assigned to Daniel J. Calabretta District Judge]*
vs.	**STIPULATION TO REQUEST CONTINUANCE OF DATE FOR FILING OF JOINT STATUS REPORT AND ORDER THEREON**
COSTCO WHOLESALE CORPORATION; MANNY DOE 1; and DOES 2 to 100 Inclusive,	
Defendant(s).	

IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-entitled action and their respective counsel, as follows:

On March 21, 2025, the Court ordered the parties submit a brief joint report regarding the status of the case within seven (7) days. At the time of the Court's order, the handling attorney for the defense was unavailable on vacation and is not scheduled to return until March 31, 2025, after the joint report is due. The parties respectfully request that the Court continue the date for filing

Maire & Deedon
2851 Park Marina Dr., Ste. 300
Redding, CA 96001-2813
(530) 246-6050

PAGE 1

STIPULATION TO REQUEST CONTINUANCE OF DATE FOR FILING OF JOINT STATUS REPORT AND ORDER THEREON

1 of the joint status report until April 4, 2025, to allow time for counsel to meet and confer and

2 prepare the joint status report.

3 Dated: March 27, 2025   MAIRE & DEEDON

4

5   /s/ John R. Powell

6   PATRICK L. DEEDON
                                            JOHN R. POWELL
7   Attorneys for Defendant,
                                            COSTCO WHOLESALE CORPORATION
8

9 Dated: March 27, 2025   CULVER LEGAL, LLP

10   *Anastasia Gkogka*

11   ANASTASIA GKOGKA
                                            Attorneys for Plaintiff,
12   CLARA ELENA HUERTA RAMIREZ

13
                                            ORDER
14

15   **IT IS SO ORDERED** that the parties' deadline to file a joint status report pursuant to the

16 Court's March 21, 2025, Minute Order [ECF 10] is extended to April 4, 2025.

17

18 Dated: March 31, 2025   /s/ Daniel J. Calabretta

19   THE HONORABLE DANIEL J. CALABRETTA
                                            UNITED STATES DISTRICT JUDGE
20

21

22

23

24

25

26

27

28

Maire & Deedon
2851 Park Marina Dr., Ste. 300
Redding, CA 96001-2813
(530) 246-6050

PAGE 2

STIPULATION TO REQUEST CONTINUANCE OF DATE FOR FILING OF JOINT STATUS REPORT AND ORDER THEREON